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MEMO ENDORSED

April 8, 2021

Hon. Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re:

U.S. v. John Tortora,

18 Cr. 537 (SHS)

Dear Judge Stein:

We write on John Tortora's behalf (1) to request removing electronic monitoring as a condition of Tortora's release and (2) to modify Mr. Tortora's travel limitations to permit him to travel to New Jersey at his discretion, where he owns a home. The government consents to this application. None of the other conditions of Mr. Tortora's bond will be modified.

Additionally, we write jointly with the government to request an adjournment of the *Fatico* hearing, currently scheduled for June 10, 2021, until a date convenient for the Court in November, 2021. We request this adjournment due to the ongoing pandemic and the expected backlog in the Court's and counsels' other pending matters and also to permit the parties to streamline the issues necessary for resolution prior to Mr. Tortora's sentence.

Respectfully submitted,

Nicholas G. Kaizer Levitt & Kaizer

Barry Levin Esq. Attorneys for John Tortora

cc: AUSA Christopher Clore

Defendant's request to modify his bail conditions is granted. The *Fatico* hearing is adjourned to November 10, 2021, at 11:00 a.m.

Dated: New York, New York April 9, 2021 SO ORDERED:

Sidney H. Stein, U.S.D.J.